

MEMO ENDORSED

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Federal and State Courts

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**Via ECF**

Honorable Andrew L. Carter, Jr.  
United States District Court Judge  
Southern District of New York  
40 Foley Square  
New York, New York 10007

Re: United States v. Pedro Rojas-Romero  
16 Cr 324 (ALC)

Dear Judge Carter, Jr.:

I am the CJA Appointed Counsel for Mr. Rojas-Romero. The purpose of this letter is to respectfully request an adjournment of our sentencing hearing that is scheduled for January 24<sup>th</sup> at 10 a.m.

As the Court is aware, counsel retained the Consulting Group and Mr. Reynaldo Cusicanqui to serve as the mitigation specialist in this matter. To date, Mr. Cusicanqui and his team met with Mr. Rojas-Romero and they are actively scheduling follow-up meetings with him and making contact with close family and friends. Additionally, Mr. Cusicanqui is requesting additional medical, employment and other mitigation related documents. We submit that these documents will assist the Court in formulating a sentence that is sufficient, but not greater than necessary to comply with the purpose of sentence set forth in 18 U.S.C. § 3553(a).

It is therefore requested that the Court adjourn sentencing for 60 days. We of course believe that Mr. Rojas-Romero's interests are best served if we have the additional time to gather these materials, complete the mitigation report and thereafter submit counsel submission.

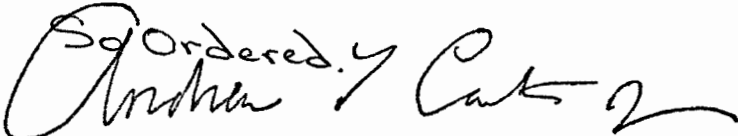
Know also that I consulted with AUSA Jacqueline Kelly in advance of this request and she advised that the government has no objection to the adjournment. Should the Court grant this request, counsel is requesting that the hearing be adjourned to the week of March 30<sup>th</sup>.

Thank you in advance for any and all consideration of this request. We will await further instructions from the Court on this matter.

Respectfully,

By:   
A. James Bell, Esq.

The application is granted. Sentencing  
adjourned to Friday, April 3, 2020 at  
11:00 a.m.

So Ordered.   
1-7-20